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April 2, 2020

**Via ECF**

Hon. Steven L. Tiscione, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Chinchu v. Patel  
Case No.: 17-cv-06127-ILG-ST

Your Honor:

This firm represents the named Plaintiff Carlos Chinchu in the above-referenced action. We submit this status letter to update the Court on the parties' discovery disputes in anticipation of today's 5:00 p.m. discovery telephone conference.

The parties have arrived at a compromise regarding Defendant Manojkumar Patel's deposition. As background, on March 30, 2020, Plaintiff noticed Defendant's deposition for April 9, 2020. See **Exhibit 1**. Defendant's counsel acknowledged receipt of the deposition notice that same day. Earlier today, for the first time Defendant's counsel stated that he would not be available on the 9<sup>th</sup> due to Passover, but proposed alternative dates for that deposition. See **Exhibit 2**. The parties subsequently agreed that Defendant Manojkumar will be deposed - as previously noticed - on **April 10, 2020**. *Id.*

This means that the only issue that remains is the scheduling of Plaintiff's deposition, which is the subject matter of our motion for a protective order and which we will discuss during our phone conference later today. We thank the Court for its attention to this matter.

Respectfully submitted,  
LAW OFFICES OF WILLIAM CAFARO  
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/s/  
Louis M. Leon (LL 2057)

To: All Counsel via ECF